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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RSUI INDEMNITY COMPANY, a New  
Hampshire Stock Company; and EVANSTON  
INSURANCE COMPANY, an Illinois corporation

Plaintiffs,

vs.

SPORTSMAN'S ROYAL MANOR, LLC, a  
Nevada Limited Liability Company; DOMONIQUE  
BROWNING-PALMER, individually; GARY  
BRENNAN, individually;

Defendants.

SPORTSMAN'S ROYAL MANOR, LLC; GARY  
BRENNAN;

Counter-claimants,

vs.

RSUI INDEMNITY COMPANY; EVANSTON  
INSURANCE COMPANY; KAERCHER  
CAMPBELL & ASSOCIATES INSURNACE  
BROKERAGE OF NEVADA, LLC; KAERCHER  
INSURANCE, AN ALERA GROUP AGENCY,  
LLC; and DOE DEFENDANTS 1-10; ROE  
DEFENDANTS 11-20;

Counter-defendants.

Case No.: 2:20-cv-01484-RFB-VCF

**STIPULATION AND PROPOSED  
ORDER TO EXTEND DEADLINES  
RELATED TO THE FED. R. CIV. P.  
12 MOTIONS FILED BY RSUI  
INDEMNITY COMPANY,  
EVANSTON INSURANCE  
COMPANY, AND KAERCHER  
INSURANCE DEFENDANTS [ECF  
NOS. 58, 59, 60, 61]**

**SECOND REQUEST**

Defendants/Counter-claimants, Sportsman's Royal Manor, LLC and Gary Brennan (collectively, "Sportsman's"), by and through their counsel, Armstrong Teasdale LLP, Plaintiff/Counter-defendant RSUI Indemnity Company ("RSUI"), by and through its counsel, Christian, Kravitz, Dichter, Johnson & Sluga, PLLC, Plaintiff/Counter-defendant Evanston Insurance Company ("Evanston"), by and through its counsel, Clyde & Co US LLP, and Counter-defendants Kaercher Campbell & Associates Insurance Brokerage of Nevada, LLC and Kaercher Insurance, an Alera Group Agency, LLC (collectively, "Kaercher Insurance"), by and through their counsel, Lipson Neilson PC, hereby move pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadlines for the parties to file their opposition and reply briefs to the pending Fed. R. Civ. P. 12 motions and joinders filed by RSUI, Evanston, and Kaercher Insurance, including:

- RSUI's Motion to Dismiss Counts 1, 2, 3, and 4 of the First Amended Counterclaim (ECF No. 58), filed December 22, 2020;
- Kaercher Campbell & Associates Insurance Brokerage of Nevada, LLC and Kaercher Insurance, an Alera Group Agency, LLC's Motion to Dismiss Counts 6, 7, and 8 of Sportsman's Royal Manor, LLC and Gary Brennan's First Amended Counterclaim (ECF No. 59), filed December 22, 2020;
- Evanston Insurance Company's Motion to Dismiss Count 1 through 4 of the First Amended Counterclaim and Counterclaimants' Claim for Exemplary and Punitive Damages (ECF No. 60), filed December 22, 2020;
- Evanston Insurance Company's Motion to Strike Counterclaimants' Request for Exemplary Damages and Punitive Damages (ECF No. 61), filed December 22, 2020; and
- RSUI Indemnity Company's Joinder to Evanston's Motion to Strike Counterclaimants' Request for Exemplary and Punitive Damages (ECF No. 62), filed December 28, 2020

(collectively, the "Rule 12 Motions") as follows: from January 22, 2021, to January 29, 2021, for Sportsman's to file their opposition briefs, and to permit RSUI, Evanston, and Kaercher Insurance up to 14 days to file their reply briefs, or to February 12, 2021. This is the second request to extend the deadline to file opposition briefs to the Rule 12 Motions, but the first request to extend the deadline to file reply briefs to the Rule 12 Motions.

1 Good cause exists to extend the opposition and reply brief deadlines as proposed above. As  
2 set forth above, Sportsman's is presently responding to five dispositive motions that seek dismissal  
3 of almost every claim asserted within their Amended Counterclaim. Although Sportsman's has been  
4 diligent, Sportsman's requires additional time to be able to fully respond to each of the pending Rule  
5 12 Motions. RSUI, Evanston, and Kaercher Insurance have no objection to providing Sportsman's  
6 with an extension to January 29, 2021, to file the oppositions. Furthermore, the parties agree to  
7 provide RSUI, Evanston, and Kaercher Insurance up to 14 days to file their replies to the pending  
8 Rule 12 Motions. This request is made in good faith and is not intended to unreasonably delay this  
9 matter. In particular, this case was only filed in August 2020, and the Scheduling Order was only  
10 recently entered (ECF No. 56).

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Based on the foregoing, the parties respectfully request that this Court extend Sportsman's deadline to file their oppositions to the pending Rule 12 Motions from January 22, 2021, to January 29, 2021, and to allow RSUI, Evanston, and Kaercher Insurance up to 14 days to file their replies thereto, or to February 12, 2021.

Dated this 21<sup>st</sup> day of January, 2021.

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Kaercher Insurance, an Alera Group Agency,  
LLC*

**ORDER**

**IT IS SO ORDERED.**

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 22nd day of January, 2021.